<div align="center">REMARKS</div>

Claims 1-17 are pending in the application. Claims 14-17 are rejected under 35 U.S.C. §102(e). Claims 1-13 are rejected under 35 U.S.C. §103(a). Applicants respectfully traverse these rejections for at least the reasons stated below and respectfully request that the Examiner reconsiders and withdraws these rejections.


I.      REJECTIONS UNDER 35 U.S.C. §102(e):

The Examiner has rejected claims 14-17 as being anticipated by Simonoff (U.S. Patent No. 6,463,460). Applicants respectfully traverse these rejections for at least the reasons stated below and respectfully request the Examiner to reconsider and withdraw this rejection.

For a claim to be anticipated under 35 U.S.C. §102, each and every claim limitation must be found within the cited prior art reference and arranged as required by the claim. M.P.E.P. § 2131.

Regarding claim 14, Applicants respectfully assert that Simonoff does not disclose "a rapid event generator accessible by an event champion and operable to define an architecture of the virtual event based on authorizations of a network administrator for an organization to access the network and an organization administrator associated with the authorized organization for the event champion to create the virtual event, wherein the organization administrator grants authority to a plurality of organizations to access the network, wherein each organization controls associated virtual events based on templates from the network administrator." The Examiner relies upon column 6, lines 1-67; column 7, lines 1-6; column 8, lines 37-40; column 9, lines 21-57; and column 13, line 59 – column 14, line 43 of Simonoff as disclosing the above-cited claim limitations. Office Action (4/10/2006), page 6. Applicants respectfully traverse.

Simonoff instead discloses that an object of the present invention is to provide a method suitable for conducting networked classroom training. Column 6, lines 1-2. Simonoff further discloses that an object of the present invention is to provide a

method facilitating interaction between two or more clients via a server. Column 6, lines 12-14. Additionally, Simonoff discloses that the primary server stores all of the user-generated objects transmitted from the client computers, and the primary server selectively transmits the user-generated objects to respective ones of the computers responsive to the respective privilege level. Column 7, lines 2-6. Further, Simonoff discloses that all users are required to log into a White Board secure server, allowing each client to be uniquely identified. Column 8, lines 37-38. In addition, Simonoff discloses server hosts, an application host and client computers, all of which are interconnected to one another via a LAN or WAN. Column 9, lines 21-25. Additionally, Simonoff discloses that numeral 1006 is used to highlight the fact that the White Board clients on computers advantageously can be displayed on any commercial off the shelf computer system capable of employing the JAVA™ enabled web browser. Column 13, lines 59-63.

There is no language in the cited passages that discloses a rapid event generator accessible by an event champion. Neither is there any language in the cited passages that discloses a rapid event generator accessible by an event champion and operable to define an architecture of the virtual event. Neither is there any language in the cited passages that discloses a rapid event generator accessible by an event champion and operable to define an architecture of the virtual event based on authorizations of a network administrator for an organization to access the network. Neither is there any language in the cited passages that discloses a rapid event generator accessible by an event champion and operable to define an architecture of the virtual event based on authorizations of a network administrator for an organization to access the network and an organization administrator associated with the authorized organization for the event champion to create the virtual event. Neither is there any language in the cited passages that discloses that the organization administrator grants authority to a plurality of organizations to access the network. Neither is there any language in the cited passages that discloses that each organization controls associated virtual events based on templates from the network

administrator. Thus, Simonoff does not disclose all of the limitations of claim 14, and thus Simonoff does not anticipate claim 14. M.P.E.P. §2131.

Applicants respectfully request the Examiner to specifically identify in the cited passages which elements in Simonoff allegedly disclose a rapid event generator, an event champion, a network administrator, an organization, and an organization administrator pursuant to 37 C.F.R. §1.104(c)(2).

Claims 15-17 each recite combinations of features of independent claim 14 and hence are not anticipated by Simonoff for at least the above-stated reasons that claim 14 is not anticipated by Simonoff.

Regarding claim 15, Applicants respectfully assert that Simonoff does not disclose "a content contributor module associated with the network and operable to upload predetermined content authorized by the event champion." The Examiner relies upon column 11, lines 24-43 of Simonoff as disclosing the above-cited claim limitation. Office Action (4/10/2006), page 6. Applicants respectfully traverse and assert that Simonoff instead discloses a listing of the features and functions accessible via the pull down menus. Column 10, line 24 – column 11, line 50. There is no language in the cited passage that discloses a content contributor module associated with the network. Neither is there any language in the cited passage that discloses a content contributor module associated with the network and operable to upload predetermined content authorized by the event champion. Thus, Simonoff does not disclose all of the limitations of claim 15, and thus Simonoff does not anticipate claim 15. M.P.E.P. §2131.

Further, in connection with the rejection of the above-cited claim limitation, Applicants respectfully request the Examiner to specifically identify in the cited passage which element in Simonoff allegedly discloses a content contributor module pursuant to 37 C.F.R. §1.104(c)(2).

Regarding claim 16, Applicants respectfully assert that Simonoff does not disclose "wherein the organization administrator authorizes a virtual event by creating

an event instance." The Examiner relies upon column 23, lines 3-13 of Simonoff as disclosing the above-cited claim limitation. Office Action (4/10/2006), page 6. Applicants respectfully traverse and assert that Simonoff instead discloses that after transmitting the predetermined shape object to the White Board client, the subroutine S15 jumps to step S17 during step S15G. Column 3, lines 6-8. There is no language in the cited passage that discloses an organization administrator authorizing a virtual event by creating an event instance. Thus, Simonoff does not disclose all of the limitations of claim 16, and thus Simonoff does not anticipate claim 16. M.P.E.P. §2131.

Further, in connection with the rejection of the above-cited claim limitation, the Examiner states that it is inherent that Simonoff discloses the above-cited claim limitation. Office Action (4/10/2006), page 6. Applicants respectfully traverse. The Examiner must provide a basis in fact and/or technical reasoning to support the assertion that Simonoff inherently discloses an organization administrator authorizing a virtual event by creating an event instance. *Ex parte Levy*, 17 U.S.P.Q.2d 1461, 1464 (Bd. Pat. App. & Inter. 1990). That is, the Examiner must provide extrinsic evidence that must make clear that Simonoff inherently discloses an organization administrator authorizing a virtual event by creating an event instance, and that it would be so recognized by persons of ordinary skill. *In re Robertson*, 169 F.3d 743, 745 (Fed. Cir. 1999). Since the Examiner has not provided any such objective evidence, the Examiner has not presented a *prima facie* case of anticipation for rejecting claim 16. M.P.E.P. §2131.

Regarding claim 17, Applicants respectfully assert that Simonoff does not disclose "wherein the rapid event generator comprises an object operable to accept the event instance created by the organization administrator and further operable to generate a virtual event object from the event instance and data provided by the event champion." The Examiner relies upon column 6, lines 1-67 and column 7, lines 1-6 of Simonoff as disclosing the above-cited claim limitation. Office Action (4/10/2006), page 7. Applicants respectfully traverse.

As stated above, Simonoff instead discloses that an object of the present invention is to provide a method suitable for conducting networked classroom training. Column 6, lines 1-2. Simonoff further discloses that an object of the present invention is to provide a method facilitating interaction between two or more clients via a server. Column 6, lines 12-14. Additionally, Simonoff discloses that the primary server stores all of the user-generated objects transmitted from the client computers, and the primary server selectively transmits the user-generated objects to respective ones of the computers responsive to the respective privilege level. Column 7, lines 2-6.

There is no language in the cited passages that discloses a rapid event generator that includes an object operable to accept the event instance created by the organization administrator. Neither is there any language in the cited passages that discloses a rapid event generator that includes an object operable to accept the event instance created by the organization administrator and further operable to generate a virtual event object from the event instance. Neither is there any language in the cited passages that discloses a rapid event generator that includes an object operable to accept the event instance created by the organization administrator and further operable to generate a virtual event object from the event instance and data provided by the event champion. Thus, Simonoff does not disclose all of the limitations of claim 17, and thus Simonoff does not anticipate claim 17. M.P.E.P. §2131.

As a result of the foregoing, Applicants respectfully assert that not each and every claim limitation was found within Simonoff, and thus claims 14-17 are not anticipated by Simonoff. M.P.E.P. §2131.

II.    REJECTIONS UNDER 35 U.S.C. §103(a):

A.    Claims 1-5, 7 and 10-13 are patentable over Simonoff in view of Levy.

The Examiner has rejected claims 1-5, 7 and 10-13 under 35 U.S.C. §103(a) as being unpatentable over Simonoff in view of Levy et al. (U.S. Patent Publication No. 2002/0124074) (hereinafter "Levy"). Applicants respectfully traverse for at least

the reasons stated below and respectfully request the Examiner to reconsider and withdraw these rejections.

        1.     <u>Simonoff and Levy, taken singly or in combination, do not teach or suggest the following claim limitations.</u>

Regarding claim 1, Applicants respectfully assert that Simonoff and Levy, taken singly or in combination, do not teach or suggest "an ASP administration module having authority to grant plural organizations access to the network, the ASP administration module providing templates used by plural contributors to upload content for virtual events, and the ASP administration module granting authority to the plural organizations to create, access, and present virtual events." The Examiner relies upon column 8, lines 26-44; column 9, lines 21-57 and column 9, line 65 – column 10, line 11 of Simonoff as teaching the above-cited claim limitations. Office Action (4/10/2006), pages 7-8. Applicants respectfully traverse.

Simonoff instead teaches that the combination of the CCE software and a JAVA™ enabled browser at each user location permits collaboration between users of a multilayer White Board. Column 8, lines 22-24. Simonoff further teaches a computer system that includes a server host, an application host, and client host computers, all of which are interconnected to one another via a LAN or a WAN. Column 9, lines 22-25. Additionally, Simonoff teaches that the file drop down menu includes commands for both uploading and downloading files to the White Board server. Column 9, line 67 – column 10, line 2.

There is no language in the cited passages that teaches an ASP administration module having authority to grant plural organizations access to the network. Neither is there any language in the cited passages that teaches an ASP administration module that provides templates used by plural contributors to upload content for virtual events. Neither is there any language in the cited passages that teaches an ASP administration module that grants authority to the plural organizations to create, access, and present virtual events. Therefore, the Examiner has not presented a *prima facie* case of obviousness in rejecting claim 1, since the Examiner is relying upon

incorrect, factual predicates in support of the rejection. *In re Rouffet*, 47 U.S.P.Q.2d 1453, 1455 (Fed. Cir. 1998).

Furthermore, regarding claim 1, Applicants respectfully assert that Simonoff and Levy, taken singly or in combination, do not teach or suggest "an organization administration module associated with an organization, the organization administration module having authority to create a virtual event associated with the organization, the organization hereby having decentralized control over the virtual event." The Examiner relies upon column 8, lines 26-44; column 18, lines 25-31 and column 25, lines 3-13 of Simonoff as teaching the above-cited claim limitations. Office Action (4/10/206), page 8. Applicants respectfully traverse.

Simonoff instead teaches that the CCE software advantageously can be a JAVA™ applet. Column 8, lines 26-27. Simonoff further teaches that the White Board system advantageously can provide a view only mode to facilitate teachers (lecture)/student relationships via the White Board system. Column 18, lines 25-28. Simonoff further teaches that since each White Board client is logged into the White Board server, and since the White Board server includes a filtering function, multiple white board drawing rooms advantageously are supported by a single White Board server. Column 25, lines 3-7.

There is no language in the cited passages that teaches an organization administration module associated with an organization. Neither is there any language in the cited passages that teaches an organization administration module having authority to create a virtual event associated with the organization. Neither is there any language in the cited passages that teaches an organization administration module having authority to create a virtual event associated with the organization, the organization hereby having decentralized control over the virtual event. Therefore, the Examiner has not presented a *prima facie* case of obviousness in rejecting claim 1, since the Examiner is relying upon incorrect, factual predicates in support of the rejection. *In re Rouffet*, 47 U.S.P.Q.2d 1453, 1455 (Fed. Cir. 1998).

Additionally, regarding claim 1, Applicants respectfully assert that Simonoff and Levy, taken singly or in combination, do not teach or suggest "an event champion module associated with the virtual event and operable to establish a virtual event architecture that accepts content for the virtual event from a plurality of predetermined contributors." The Examiner relies upon column 9, lines 65-67 and column 10, lines 1-11 of Simonoff as teaching the above-cited claim limitation. Office Action (4/10/2006), page 8. Applicants respectfully traverse and assert that Simonoff instead teaches that the White Board client presents what appears to be several drop down or pull down menus. Column 9, lines 65-67. Simonoff further teaches that the file drop down menu includes commands for both uploading and downloading files to the White Board server. Column 9, line 67 – column 10, line 2. There is no language in the cited passages that teaches an event champion module associated with a virtual event. Neither is there any language in the cited passages that teaches an event champion module associated with a virtual event and operable to establish a virtual event architecture. Neither is there any language in the cited passages that teaches an event champion module associated with a virtual event and operable to establish a virtual event architecture that accepts content for the virtual event from a plurality of predetermined contributors. Therefore, the Examiner has not presented a *prima facie* case of obviousness in rejecting claim 1, since the Examiner is relying upon incorrect, factual predicates in support of the rejection. *In re Rouffet*, 47 U.S.P.Q.2d 1453, 1455 (Fed. Cir. 1998).

Furthermore, regarding claim 1, Applicants respectfully assert that Simonoff and Levy, taken singly or in combination, do not teach or suggest "a contributor module interfaced with the network and operable to upload content from the plurality of predetermined contributors to the virtual event based upon authority granted to the contributors from the event champion module." The Examiner relies upon column 11, lines 24-43 of Simonoff as teaching the above-cited claim limitation. Office Action (4/10/2006), page 8. Applicants respectfully traverse. As stated above, Simonoff instead teaches a listing of the features and functions accessible via the pull down menus. Column 10, line 24 – column 11, line 50. There is no language in the

cited passage that teaches a contributor module interfaced with the network. Neither is there any language in the cited passage that teaches a contributor module interfaced with the network and operable to upload content from the plurality of predetermined contributors. Neither is there any language in the cited passage that teaches a contributor module interfaced with the network and operable to upload content from the plurality of predetermined contributors to the virtual event. Neither is there any language in the cited passage that teaches a contributor module interfaced with the network and operable to upload content from the plurality of predetermined contributors to the virtual event based upon authority granted to the contributors from the event champion module. Therefore, the Examiner has not presented a *prima facie* case of obviousness in rejecting claim 1, since the Examiner is relying upon incorrect, factual predicates in support of the rejection. *In re Rouffet*, 47 U.S.P.Q.2d 1453, 1455 (Fed. Cir. 1998).

Additionally, regarding claim 1, Applicants respectfully assert that Simonoff and Levy, taken singly or in combination, do not teach or suggest "an anonymous browser module that grants to an unregistered user authority to view a predetermined portion of the virtual event." The Examiner relies upon page 2, paragraph [0018] of Levy as teaching the above-cited claim limitation. Office Action (4/10/2006), page 8. Applicants respectfully traverse. Levy instead teaches that users who view web pages are, for all practical purposes, anonymous. [0018]. Levy further teaches that browsers normally transmit no information to web servers which would reliably identify the name or even the location of a particular user. [0018]. Additionally, Levy teaches that because of the multitude of web pages and the transient and happenstance nature of a user's interaction with any given page, random telephone or e-mail surveys are unlikely to produce accurate and detailed information about World Wide Web viewing patterns. [0018]. Hence, Levy teaches that web browsers normally do not transmit information to web servers that would reliably identify the name or even the location of a particular user and hence random telephone or e-mail surveys are unlikely to produce accurate and detailed information about World Wide Web viewing patterns. This is not the same as an anonymous browser <u>module</u> that

grants to an unregistered user authority to view a predetermined portion of the virtual event. Therefore, the Examiner has not presented a *prima facie* case of obviousness in rejecting claim 1, since the Examiner is relying upon incorrect, factual predicates in support of the rejection. *In re Rouffet*, 47 U.S.P.Q.2d 1453, 1455 (Fed. Cir. 1998).

Regarding claim 7, Applicants respectfully assert that Simonoff and Levy, taken singly or in combination, do not teach or suggest "authorizing plural organizations access to the network by an organization administrator, wherein the organization administrator is granted authority to grant access by an administrator." The Examiner relies upon column 8, lines 26-44; column 11, lines 44-49; column 13, line 59 – column 14, line 12; column 14, lines 26-43; and column 17, lines 22-38 of Simonoff as teaching the above-cited claim limitation. Office Action (4/10/2006), page 10. Applicants respectfully traverse.

Simonoff instead teaches that the CCE software advantageously can be a JAVA™ applet. Column 8, lines 26-27. Simonoff further teaches a comprehensive listing of the features and functions accessible via the pull down menus. Column 10, line 24- column 11, line 50. Simonoff further teaches that the White Board software and the users operating that software, advantageously can be monitored by a system administrator. Column 13, lines 64-66. Additionally, Simonoff teaches that the system administrator can operate the White Board server to both disconnect an authorized user from the White Board server and force the White Board client running on the unauthorized user's computer to shut down or "kill" the White Board client, as an added security measure. Column 14, lines 3-8. In addition, Simonoff teaches that each user has a predetermined privilege; the user may communicate with all users at the lowest common privilege setting or communicate only with those users that have an equal or higher privilege level by selecting one of the available privilege levels from the pull down menu on the White Board. Column 14, lines 29-34. Further, Simonoff teaches that when a user accesses the White Board system, he/she logs in, i.e., the White Board client presents a log in a window and the White Board server verifies user identity by username and password. Column 17, lines 22-25.

There is no language in the cited passages that teaches authorizing plural organizations access to the network by an organization administrator. Neither is there any language in the cited passages that teaches authorizing plural organizations access to the network by an organization administrator, where the organization administrator is granted authority to grant access by an administrator. Therefore, the Examiner has not presented a *prima facie* case of obviousness in rejecting claim 7, since the Examiner is relying upon incorrect, factual predicates in support of the rejection. *In re Rouffet*, 47 U.S.P.Q.2d 1453, 1455 (Fed. Cir. 1998).

Furthermore, regarding claim 7, Applicants respectfully assert that Simonoff and Levy, taken singly or in combination, do not teach or suggest "each organization authorizing the creation of one or more virtual events through the network, each virtual event having an associated event champion." The Examiner relies upon column 25, lines 3-13 of Simonoff as teaching the above-cited claim limitation. Office Action (4/10/2006), page 10. Applicants respectfully traverse and assert that Simonoff instead teaches that since each White Board client is logged into the White Board server, and since the White Board server includes a filtering function, multiple white board drawing rooms advantageously are supported by a single White Board server. Column 25, lines 3-7. There is no language in the cited passage that teaches each organization authorizing the creation of one or more virtual events through the network. Neither is there any language in the cited passage that teaches each organization authorizing the creation of one or more virtual events through the network, each virtual event having an associated event champion. Therefore, the Examiner has not presented a *prima facie* case of obviousness in rejecting claim 7, since the Examiner is relying upon incorrect, factual predicates in support of the rejection. *In re Rouffet*, 47 U.S.P.Q.2d 1453, 1455 (Fed. Cir. 1998).

Additionally, regarding claim 7, Applicants respectfully assert that Simonoff and Levy, taken singly or in combination, do not teach or suggest "establishing a virtual event architecture for each virtual event by the associated event champion, the virtual event architecture identifying one or more content contributors." The Examiner relies upon column 9, lines 65-67 and column 10, lines 1-11 of Simonoff as

teaching the above-cited claim limitation. Office Action (4/10/2006), page 10. Applicants respectfully traverse and assert that Simonoff instead teaches that the White Board client presents what appears to be several standard drop down or pull down menus. Column 9, lines 65-67. Simonoff further teaches that that the file down menu includes commands for both uploading and downloading files to the White Board server. Column 9, line 67 – column 10, line 2. There is no language in the cited passages that teaches establishing a virtual event architecture for each virtual event by the associated event champion. Neither is there any language in the cited passages that teaches establishing a virtual event architecture for each virtual event by the associated event champion, the virtual event architecture identifying one or more content contributors. Therefore, the Examiner has not presented a *prima facie* case of obviousness in rejecting claim 7, since the Examiner is relying upon incorrect, factual predicates in support of the rejection. *In re Rouffet*, 47 U.S.P.Q.2d 1453, 1455 (Fed. Cir. 1998).

Furthermore, regarding claim 7, Applicants respectfully assert that Simonoff and Levy, taken singly or in combination, do not teach or suggest "uploading content by the content contributors from the Internet, the associated event champion authorized to approve the uploaded content." The Examiner relies upon column 11, lines 24-43 and column 23, lines 42-53 of Simonoff as teaching the above-cited claim limitation. Office Action (4/10/2006), page 10. Applicants respectfully traverse and assert that Simonoff instead teaches a comprehensive listing of the features and functions accessible via the pull down menus. Column 10, line 24- column 11, line 50. Simonoff further teaches that when the answer at step S32 is negative, the White Board server performs a check at step S37 to determine whether the object(s) to be transmitted to the White Board client has a privilege level less than or equal to the privilege level assigned to the White Board client. Column 23, lines 42-46. There is no language in the cited passages that teaches uploading content by the content contributors from the Internet. Neither is there any language in the cited passages that teaches uploading content by the content contributors from the Internet, the associated event champion authorized to approve the uploaded content. Therefore,

the Examiner has not presented a *prima facie* case of obviousness in rejecting claim 7, since the Examiner is relying upon incorrect, factual predicates in support of the rejection. *In re Rouffet*, 47 U.S.P.Q.2d 1453, 1455 (Fed. Cir. 1998).

Additionally, regarding claim 7, Applicants respectfully assert that Simonoff and Levy, taken singly or in combination, do not teach or suggest "providing unregistered attendees authority to view predetermined portions of the virtual events." The Examiner relies upon page 2, paragraph [0018] of Levy as teaching the above-cited claim limitation. Office Action (4/10/2006), page 10. Applicants respectfully traverse. Levy instead teaches that users who view web pages are, for all practical purposes, anonymous. [0018]. Levy further teaches that browsers normally transmit no information to web servers which would reliably identify the name or even the location of a particular user. [0018]. Additionally, Levy teaches that because of the multitude of web pages and the transient and happenstance nature of a user's interaction with any given page, random telephone or e-mail surveys are unlikely to produce accurate and detailed information about World Wide Web viewing patterns. [0018]. Hence, Levy teaches that web browsers normally do not transmit information to web servers that would reliably identify the name or even the location of a particular user and hence random telephone or e-mail surveys are unlikely to produce accurate and detailed information about World Wide Web viewing patterns. This is not the same as providing unregistered attendees authority to view predetermined portions of the virtual events. Therefore, the Examiner has not presented a *prima facie* case of obviousness in rejecting claim 7, since the Examiner is relying upon incorrect, factual predicates in support of the rejection. *In re Rouffet*, 47 U.S.P.Q.2d 1453, 1455 (Fed. Cir. 1998).

Claims 2-6 each recite combinations of features of independent claim 1 and hence are patentable over Simonoff in view of Levy for at least the above-stated reasons that claim 1 is patentable over Simonoff in view of Levy. Claims 8-13 each recite combinations of features of independent claim 7 and hence are patentable over Simonoff in view of Levy for at least the above-stated reasons that claim 7 is patentable over Simonoff in view of Levy.

Regarding claim 2, Applicants respectfully assert that Simonoff and Levy, taken singly or in combination, do not teach or suggest "an attendee module associated with each virtual event, the attendee module operable to authorize attendees to view virtual event content." The Examiner relies upon column 18, lines 25-31 of Simonoff as teaching the above-cited claim limitation. Office Action (4/10/2006), page 9. Applicants respectfully traverse and assert that Simonoff instead teaches that the White Board system advantageously can provide a view only mode to facilitate teacher (lecture)/student relationships via the White Board system. Column 18, lines 25-28. There is no language in the cited passage that teaches an attendee module associated with each virtual event. Neither is there any language in the cited passage that teaches an attendee module operable to authorize attendees to view virtual event content. Therefore, the Examiner has not presented a *prima facie* case of obviousness in rejecting claim 2, since the Examiner is relying upon incorrect, factual predicates in support of the rejection. *In re Rouffet*, 47 U.S.P.Q.2d 1453, 1455 (Fed. Cir. 1998).

Regarding claim 3, Applicants respectfully assert that Simonoff and Levy, taken singly or in combination, do not teach or suggest "a member system module operable to establish membership for users to interface with the network." The Examiner relies upon column 14, lines 64-67 and column 15, lines 1-18 of Simonoff as teaching the above-cited claim limitation. Office Action (4/10/2006), page 9. Applicants respectfully traverse and assert that Simonoff instead teaches that the web server downloads a web page containing the White Board Applet tag to the JAVA™ enabled web browser running on the computer. Column 15, lines 1-3. There is no language in the cited passage that teaches a member system module operable to establish membership for users. Neither is there any language in the cited passage that teaches a member system module operable to establish membership for users to interface with the network. Therefore, the Examiner has not presented a *prima facie* case of obviousness in rejecting claim 3, since the Examiner is relying upon incorrect, factual predicates in support of the rejection. *In re Rouffet*, 47 U.S.P.Q.2d 1453, 1455 (Fed. Cir. 1998).

Regarding claim 4, Applicants respectfully assert that Simonoff and Levy, taken singly or in combination, do not teach or suggest "wherein the attendee module interfaces users with the member system module if the users are not members of the network." The Examiner relies upon column 14, lines 64-67 and column 15, lines 1-18 of Simonoff as teaching the above-cited claim limitation. Office Action (4/10/2006), page 9. Applicants respectfully traverse. As stated above, Simonoff instead teaches that the web server downloads a web page containing the White Board Applet tag to the JAVA™ enabled web browser running on the computer. Column 15, lines 1-3. There is no language in the cited passage that teaches an attendee module that interfaces users with the member system module. Neither is there any language in the cited passage that teaches an attendee module that interfaces users with the member system module if the users are not members of the network. Therefore, the Examiner has not presented a *prima facie* case of obviousness in rejecting claim 4, since the Examiner is relying upon incorrect, factual predicates in support of the rejection. *In re Rouffet*, 47 U.S.P.Q.2d 1453, 1455 (Fed. Cir. 1998).

Regarding claim 5, Applicants respectfully assert that Simonoff and Levy, taken singly or in combination, do not teach or suggest "a rapid event generator associate with the event champion module, the rapid event generator operable to present an event champion with one or more templates that define the architecture of the virtual event." The Examiner relies upon column 6, lines 1-67 and column 7, lines 1-6 of Simonoff as teaching the above-cited claim limitation. Office Action (4/10/2006), page 9. Applicants respectfully traverse.

As stated above, Simonoff instead teaches that an object of the present invention is to provide a method suitable for conducting networked classroom training. Column 6, lines 1-2. Simonoff further teaches that an object of the present invention is to provide a method facilitating interaction between two or more clients via a server. Column 6, lines 12-14. Additionally, Simonoff teaches that the primary server stores all of the user-generated objects transmitted from the client computers, and the primary server selectively transmits the user-generated objects to respective

ones of the computers responsive to the respective privilege level.  Column 7, lines 2-6.

There is no language in the cited passages that teaches a rapid event generator associate with the event champion module.  Neither is there any language in the cited passages that teaches a rapid event generator operable to present an event champion with one or more templates that define the architecture of the virtual event. Therefore, the Examiner has not presented a *prima facie* case of obviousness in rejecting claim 5, since the Examiner is relying upon incorrect, factual predicates in support of the rejection. *In re Rouffet*, 47 U.S.P.Q.2d 1453, 1455 (Fed. Cir. 1998).

Regarding claim 10, Applicants respectfully assert that Simonoff and Levy, taken singly or in combination, do not teach or suggest "wherein establishing the virtual event architecture further comprises identifying one or more sponsors of a virtual event."  The Examiner relies upon column 17, lines 22-38 of Simonoff as teaching the above-cited claim limitation.  Office Action (4/10/2006), page 11. Applicants respectfully traverse and assert that Simonoff instead teaches that when a user accesses the White Board system, he/she logs in, i.e., the White Board client presents a log in a window and the White Board server verifies the user identity by username and password.  Column 17, lines 22-25.  There is no language in the cited passage that teaches that establishing the virtual event architecture includes identifying one or more sponsors of a virtual event.  Therefore, the Examiner has not presented a *prima facie* case of obviousness in rejecting claim 10, since the Examiner is relying upon incorrect, factual predicates in support of the rejection. *In re Rouffet*, 47 U.S.P.Q.2d 1453, 1455 (Fed. Cir. 1998).

Regarding claim 11, Applicants respectfully assert that Simonoff and Levy, taken singly or in combination, do not teach or suggest "wherein establishing the virtual event architecture further comprises identifying one or more exhibitors of a virtual event."  The Examiner relies upon column 17, lines 22-38 of Simonoff as teaching the above-cited claim limitation.  Office Action (4/10/2006), page 11. Applicants respectfully traverse.  As stated above, Simonoff instead teaches that

when a user accesses the White Board system, he/she logs in, i.e., the White Board client presents a log in a window and the White Board server verifies the user identity by username and password. Column 17, lines 22-25. There is no language in the cited passage that teaches establishing the virtual event architecture includes identifying one or more exhibitors of a virtual event. Therefore, the Examiner has not presented a *prima facie* case of obviousness in rejecting claim 11, since the Examiner is relying upon incorrect, factual predicates in support of the rejection. *In re Rouffet*, 47 U.S.P.Q.2d 1453, 1455 (Fed. Cir. 1998).

Regarding claim 12, Applicants respectfully assert that Simonoff and Levy, taken singly or in combination, do not teach or suggest "previewing by the event champion of content loaded to a virtual event." The Examiner relies upon column 9, lines 65-67 and column 10, lines 1-11 of Simonoff as teaching the above-cited claim limitation. Office Action (4/10/2006), page 11. Applicants respectfully traverse and assert that Simonoff instead teaches that the White Board client presents what appears to be several drop down or pull down menus. Column 9, lines 65-67. Simonoff further teaches that the file drop down menu includes commands for both uploading and downloading files to the White Board server. Column 9, line 67 – column 10, line 2. There is no language in the cited passages that teaches previewing by an event champion of content loaded to a virtual event. Therefore, the Examiner has not presented a *prima facie* case of obviousness in rejecting claim 12, since the Examiner is relying upon incorrect, factual predicates in support of the rejection. *In re Rouffet*, 47 U.S.P.Q.2d 1453, 1455 (Fed. Cir. 1998).

Furthermore, regarding claim 12, Applicants respectfully assert that Simonoff and Levy, taken singly or in combination, do not teach or suggest "authorizing the previewed content by the event champion for presentation in the virtual event." The Examiner relies upon column 18, lines 25-31 of Simonoff as teaching the above-cited claim limitation. Office Action (4/10/2006), page 11. Applicants respectfully traverse and assert that Simonoff instead teaches that the White Board system advantageously can provide a view only mode to facilitate teachers (lecture)/student relationships via the White Board system. Column 18, lines 25-28. There is no

language in the cited passage that teaches authorizing the previewed content by the event champion. Neither is there any language in the cited passage that teaches authorizing the previewed content by the event champion for presentation in the virtual event. Therefore, the Examiner has not presented a *prima facie* case of obviousness in rejecting claim 12, since the Examiner is relying upon incorrect, factual predicates in support of the rejection. *In re Rouffet*, 47 U.S.P.Q.2d 1453, 1455 (Fed. Cir. 1998).

As a result of the foregoing, Applicants respectfully assert that there are numerous claim limitations not taught or suggested in Simonoff in view of Levy, and thus the Examiner has not presented a *prima facie* case of obviousness in rejecting claims 1-5, 7 and 10-13. M.P.E.P. §2143.

2.   The Examiner's motivation for modifying Simonoff with Levy to include the missing claim limitations from claim 1 and 7 is insufficient to establish a *prima facie* case of obviousness.

Most if not all inventions arise from a combination of old elements. *See In re Rouffet*, 47 U.S.P.Q.2d 1453, 1457 (Fed. Cir. 1998). Obviousness is determined from the vantage point of a hypothetical person having ordinary skill in the art to which the patent pertains. *In re Rouffet*, 47 U.S.P.Q.2d 1453, 1457 (Fed. Cir. 1998). Therefore, an Examiner may often find every element of a claimed invention in the prior art. *Id*. However, identification in the prior art of each individual part claimed is insufficient to defeat patentability of the whole claimed invention. *See Id*. In order to establish a *prima facie* case of obviousness, the Examiner must show reasons that the skilled artisan, confronted with the same problems as the inventor and with no knowledge of the claimed invention, would select the elements from the cited prior art references for combination in the manner claimed. *In re Rouffet*, 47 U.S.P.Q.2d 1453, 1458 (Fed. Cir. 1998). That is, the Examiner must provide some suggestion or motivation, either in the references themselves, the knowledge of one of ordinary skill in the art, or, in some case, the nature of the problem to be solved, to modify the reference or to combine reference teachings. *See In re Dembiczak*, 175 F.3d 994, 999, 50 U.S.P.Q.2d 1614, 1617 (Fed. Cir. 1999). Whether the Examiner relies on an express

or an implicit showing, the Examiner must provide particular findings related thereto. *In re Kotzab*, 55 U.S.P.Q.2d 1313, 1317 (Fed. Cir. 2000).

The Examiner admits that Simonoff does not teach an anonymous browser module that grants to an unregistered user authority to view a predetermined portion of the virtual event, as recited in claim 1 and similarly in claim 7. Office Action (4/10/2006), pages 8 and 10. The Examiner asserts that Levy teaches this missing claim limitation. *Id.* The Examiner modifies Simonoff with Levy to include the above-cited claim limitation because "[t]his would have provided a well-known means for both registered and unregistered users to view a virtual event, (Levy, page 2, paragraph 18, Simonoff, col. 13, line 59 through col. 14, line 12)." Office Action (4/10/2006), pages 8-9 and 11. The Examiner's motivation is insufficient to establish a *prima facie* case of obviousness in rejecting claims 1-13.

The Examiner's motivation ("[t]his would have provided a well-known means for both registered and unregistered users to view a virtual event") does not provide reasons, as discussed further below, that the skilled artisan, confronted with the same problems as the inventor and with no knowledge of the claimed invention, would modify Simonoff to include the missing claim limitations of claims 1 and 7. Accordingly, the Examiner has not presented a *prima facie* case of obviousness for rejecting claims 1-13. *In re Rouffet*, 47 U.S.P.Q.2d 1453, 1458 (Fed. Cir. 1998).

As stated above, the Examiner cites page 2, paragraph [0018] of Levy and column 13, line 59 – column 14, line 12 of Simonoff as support for the Examiner's motivation. Levy teaches that because of the multitude of web pages and the transient and happenstance nature of a user's interaction with any given page, random telephone or e-mail surveys are unlikely to produce accurate and detailed information about World Wide Web viewing patterns. [0018]. Simonoff teaches that the White Board software, and the users operating that software, advantageously can be monitored by a system administrator. Column 13, lines 64-66. There is no language in these cited passages that supports the Examiner's assertion that having an anonymous browser module that grants to an unregistered user authority to view a

predetermined portion of the virtual event is a well known means for both registered and unregistered users to view a virtual event. As a result, the Examiner's cited passages do not provide reasons that the skilled artisan, confronted with the same problems as the inventor and with no knowledge of the claimed invention, would modify Simonoff to include the missing claim limitations of claims 1 and 7. Accordingly, the Examiner has not presented a *prima facie* case of obviousness for rejecting claims 1-13. *In re Rouffet*, 47 U.S.P.Q.2d 1453, 1458 (Fed. Cir. 1998).

Further, Simonoff addresses the problem of having a computer network or system where various users can use the same computer program and share information beyond the visualization of a map, text or photograph regardless of variations in the individual components of the system. Column 5, lines 13-17. The Examiner has not provided any reasons as to why one skilled in the art would modify Simonoff, which teaches a computer network or system where various users can use the same computer program and share information beyond the visualization of a map, text or photograph regardless of variations in the individual components of the system, to have an anonymous browser module that grants to an unregistered user authority to view a predetermined portion of the virtual event (missing claim limitation of Simonoff). The Examiner's motivation ("[t]his would have provided a well-known means for both registered and unregistered users to view a virtual event") does not provide such reasoning. Hence, the Examiner's motivation does not provide reasons that the skilled artisan, confronted with the same problems as the inventor and with no knowledge of the claimed invention, would modify Simonoff to include the missing claim limitations of claims 1 and 7. Accordingly, the Examiner has not presented a *prima facie* case of obviousness for rejecting claims 1-13. *In re Rouffet*, 47 U.S.P.Q.2d 1453, 1458 (Fed. Cir. 1998).

Furthermore, based on the Examiner's stated motivation ("[t]his would have provided a well-known means for both registered and unregistered users to view a virtual event"), the Examiner appears to be asserting that since the references can be combined that it would have been obvious to combine Simonoff with Levy. However, the mere fact that references <u>can</u> be combined or modified does not render

the resultant combination obvious unless the prior art also suggest the desirability of the combination. *In re Mills*, 916 F.2d 680, 16 U.S.P.Q.2d 1430 (Fed. Cir. 1990); M.P.E.P. §2143.01. Hence, the Examiner's stated motivation is insufficient to support a *prima facie* case of obviousness in rejecting claims 1-13. *Id.*

> B.   Claims 6 and 8-9 are patentable over Simonoff in view of Levy and in further view of Estrada.

The Examiner has rejected claims 6 and 8-9 under 35 U.S.C. §103(a) as being unpatentable over Simonoff in view of Levy and in further view of Estrada et al. (U.S. Patent No. 6,732,148) (hereinafter "Estrada"). Applicants respectfully traverse for at least the reasons stated below and respectfully request the Examiner to reconsider and withdraw these rejections.

> 1.   Simonoff, Levy and Estrada, taken singly or in combination, do not teach or suggest the following claim limitations.

Regarding claim 6, Applicants respectfully assert that Simonoff, Levy and Estrada, taken singly or in combination, do not teach or suggest "wherein the rapid event generator defines the number of attendees, the type of content and the duration of the virtual event." The Examiner relies upon column 11, lines 64-67; column 12, lines 1-14 and column 32, lines 21-32 of Estrada as teaching the above-cited claim limitation. Office Action (4/10/2006), page 12. Applicants respectfully traverse.

Estrada instead teaches that objects within the QuickPlace module include a place with rooms, rooms having folders (optional) and pages; and a place having members. Column 12, lines 1-3. Estrada further teaches that when a place is created, one room is created in which pages can be created. Column 12, lines 3-5. Additionally, Estrada teaches that a place is created from a placetype, which is a template that specifies the number of rooms, members, security for rooms, look and feel, and forms and folders in each room. Column 12, lines 5-8. There is no language in the cited passages that teaches a rapid event generator defining the number of attendees, the type of content and the duration of the virtual event. Therefore, the Examiner has not presented a *prima facie* case of obviousness in

rejecting claim 6, since the Examiner is relying upon incorrect, factual predicates in support of the rejection. *In re Rouffet*, 47 U.S.P.Q.2d 1453, 1455 (Fed. Cir. 1998).

Regarding claim 8, Applicants respectfully assert that Simonoff, Levy and Estrada, taken singly or in combination, do not teach or suggest "defining a predetermined period for presentation of a virtual event through the Internet." The Examiner relies upon column 32, lines 21-32 of Estrada as teaching the above-cited claim limitation. Office Action (4/10/2006), page 13. Applicants respectfully traverse and assert that Estrada instead teaches that it is an advantage of the invention that there is provided a system and method which enables a user to accelerate productivity by easily creating and maintaining collaborative spaces on a network. Column 32, lines 26-30. There is no language in the cited passage that teaches defining a predetermined period for presentation. Neither is there any language in the cited passage that teaches defining a predetermined period for presentation of a virtual event. Neither is there any language in the cited passage that teaches defining a predetermined period for presentation of a virtual event though the Internet. Therefore, the Examiner has not presented a *prima facie* case of obviousness in rejecting claim 8, since the Examiner is relying upon incorrect, factual predicates in support of the rejection. *In re Rouffet*, 47 U.S.P.Q.2d 1453, 1455 (Fed. Cir. 1998).

Furthermore, regarding claim 8, Applicants respectfully assert that Simonoff, Levy and Estrada, taken singly or in combination, do not teach or suggest "authorizing predetermined attendees to access the virtual event during the predetermined time period." The Examiner relies upon column 18, lines 25-31 of Simonoff for the teaching of authorizing predetermined attendees to access the virtual event. Office Action (4/10/2006), page 12. The Examiner further relies upon column 32, lines 21-32 of Estrada for the teaching of during the predetermined time period. *Id.* Applicants respectfully traverse.

Simonoff instead teaches that the White Board system advantageously can provide a view only mode to facilitate teacher (lecture)/student relationships via the White Board system. Column 18, lines 26-28. There is no language in the cited

passage that teaches <u>authorizing predetermined attendees</u> to access the virtual event. Therefore, the Examiner has not presented a *prima facie* case of obviousness in rejecting claim 8, since the Examiner is relying upon incorrect, factual predicates in support of the rejection. *In re Rouffet*, 47 U.S.P.Q.2d 1453, 1455 (Fed. Cir. 1998).

Estrada instead teaches that it is an advantage of the invention that there is provided a system and method which enables a user to accelerate productivity by easily creating and maintaining collaborative spaces on a network. Column 32, lines 26-30. There is no language in the cited passage that teaches the aspect of a predetermined time period. Therefore, the Examiner has not presented a *prima facie* case of obviousness in rejecting claim 8, since the Examiner is relying upon incorrect, factual predicates in support of the rejection. *In re Rouffet*, 47 U.S.P.Q.2d 1453, 1455 (Fed. Cir. 1998).

Regarding claim 9, Applicants respectfully assert that Simonoff, Levy and Estrada, taken singly or in combination, do not teach or suggest "establishing membership to the network for an attendee before authorizing access by that attendee to the virtual event." The Examiner relies upon column 14, lines 64-67 and column 15, lines 1-18 of Simonoff as teaching the above-cited claim limitation. Office Action (4/10/2006), page 13. Applicants respectfully traverse and assert that Simonoff instead teaches that the web server downloads a web page containing the White Board Applet tag to the JAVA™ enabled web browser running on the computer. Column 15, lines 1-3. There is no language in the cited passage that teaches establishing membership to the network. Neither is there any language in the cited passage that teaches establishing membership to the network for an attendee. Neither is there any language in the cited passage that teaches establishing membership to the network for an attendee before authorizing access by that attendee. Neither is there any language in the cited passage that teaches establishing membership to the network for an attendee before authorizing access by that attendee to the virtual event. Therefore, the Examiner has not presented a *prima facie* case of obviousness in rejecting claim 9, since the Examiner is relying upon incorrect, factual

predicates in support of the rejection. *In re Rouffet*, 47 U.S.P.Q.2d 1453, 1455 (Fed. Cir. 1998).

As a result of the foregoing, Applicants respectfully assert that there are numerous claim limitations not taught or suggested in Simonoff in view of Levy and in further view of Estrada, and thus the Examiner has not presented a *prima facie* case of obviousness in rejecting claims 6 and 8-9. M.P.E.P. §2143.

> 2. Examiner's motivation for modifying Simonoff with Estrada to include the missing claim limitation of claim 6 is insufficient to establish a *prima facie* case of obviousness.

As stated above, most if not all inventions arise from a combination of old elements. *See In re Rouffet*, 47 U.S.P.Q.2d 1453, 1457 (Fed. Cir. 1998). Obviousness is determined from the vantage point of a hypothetical person having ordinary skill in the art to which the patent pertains. *In re Rouffet*, 47 U.S.P.Q.2d 1453, 1457 (Fed. Cir. 1998). Therefore, an Examiner may often find every element of a claimed invention in the prior art. *Id.* However, identification in the prior art of each individual part claimed is insufficient to defeat patentability of the whole claimed invention. *See Id.* In order to establish a *prima facie* case of obviousness, the Examiner must show reasons that the skilled artisan, confronted with the same problems as the inventor and with no knowledge of the claimed invention, would select the elements from the cited prior art references for combination in the manner claimed. *In re Rouffet*, 47 U.S.P.Q.2d 1453, 1458 (Fed. Cir. 1998). That is, the Examiner must provide some suggestion or motivation, either in the references themselves, the knowledge of one of ordinary skill in the art, or, in some case, the nature of the problem to be solved, to modify the reference or to combine reference teachings. *See In re Dembiczak*, 175 F.3d 994, 999, 50 U.S.P.Q.2d 1614, 1617 (Fed. Cir. 1999). Whether the Examiner relies on an express or an implicit showing, the Examiner must provide particular findings related thereto. *In re Kotzab*, 55 U.S.P.Q.2d 1313, 1317 (Fed. Cir. 2000).

The Examiner admits that Simonoff does not teach a rapid event generator that defines the number of attendees, the type of content and the duration of the virtual event, as recited in claim 6. Office Action (4/10/2006), page 12. The Examiner asserts that Estrada teaches this missing claim limitation. *Id.* The Examiner's motivation for modifying Simonoff with Estrada to include the aspect of a rapid event generator that defines the number of attendees, the type of content and the duration of the virtual event is to "give[n] the attendees more insight to how many other attendees are interested in the same type content, what exactly the content is, and how long an event will take place, Estrada, col. 5, lines 51-67, col. 6, lines 1-9." Office Action (4/10/2006), page 12. The Examiner's motivation is insufficient to establish a *prima facie* case of obviousness in rejecting claim 6.

The Examiner's motivation ("give[n] the attendees more insight to how many other attendees are interested in the same type content, what exactly the content is, and how long an event will take place") does not provide reasons, as discussed further below, that the skilled artisan, confronted with the same problems as the inventor and with no knowledge of the claimed invention, would modify Simonoff to include the missing claim limitation of claim 6. Accordingly, the Examiner has not presented a *prima facie* case of obviousness for rejecting claim 6. *In re Rouffet*, 47 U.S.P.Q.2d 1453, 1458 (Fed. Cir. 1998).

As stated above, the Examiner cites column 5, lines 51-67 and column 6, lines 1-9 of Estrada as support for the Examiner's motivation. Estrada teaches a system and method for creating and managing a customizable and secure web collaboration space through the submission by a user of web forms from a web browser and allowing other users to contribute to the customization of that site as well as to its content. Column 5, lines 51-56. There is no language in these cited passages that supports the Examiner's assertion that there is motivation for providing the attendees with more insight to how many other insights are interested in the same type of content, what exactly the content is and how long an event will take place. As a result, the Examiner's cited passages do not provide reasons that the skilled artisan, confronted with the same problems as the inventor and with no knowledge of the

claimed invention, would modify Simonoff to include the missing claim limitation of claim 6. Accordingly, the Examiner has not presented a *prima facie* case of obviousness for rejecting claim 6. *In re Rouffet*, 47 U.S.P.Q.2d 1453, 1458 (Fed. Cir. 1998).

Further, Simonoff addresses the problem of having a computer network or system where various users can use the same computer program and share information beyond the visualization of a map, text or photograph regardless of variations in the individual components of the system. Column 5, lines 13-17. The Examiner has not provided any reasons as to why one skilled in the art would modify Simonoff, which teaches a computer network or system where various users can use the same computer program and share information beyond the visualization of a map, text or photograph regardless of variations in the individual components of the system, to have a rapid event generator that defines the number of attendees, the type of content and the duration of the virtual event (missing claim limitation of Simonoff). The Examiner's motivation ("give[n] the attendees more insight to how many other attendees are interested in the same type content, what exactly the content is, and how long an event will take place") does not provide such reasoning. Hence, the Examiner's motivation does not provide reasons that the skilled artisan, confronted with the same problems as the inventor and with no knowledge of the claimed invention, would modify Simonoff to include the missing claim limitation of claim 6. Accordingly, the Examiner has not presented a *prima facie* case of obviousness for rejecting claim 6. *In re Rouffet*, 47 U.S.P.Q.2d 1453, 1458 (Fed. Cir. 1998).

   3. <u>Examiner's motivation for modifying Simonoff with Estrada to include the missing claim limitation of claim 8 is insufficient to establish a *prima facie* case of obviousness.</u>

As stated above, most if not all inventions arise from a combination of old elements. *See In re Rouffet*, 47 U.S.P.Q.2d 1453, 1457 (Fed. Cir. 1998). Obviousness is determined from the vantage point of a hypothetical person having ordinary skill in the art to which the patent pertains. *In re Rouffet*, 47 U.S.P.Q.2d

1453, 1457 (Fed. Cir. 1998). Therefore, an Examiner may often find every element of a claimed invention in the prior art. *Id.* However, identification in the prior art of each individual part claimed is insufficient to defeat patentability of the whole claimed invention. *See Id.* In order to establish a *prima facie* case of obviousness, the Examiner must show reasons that the skilled artisan, confronted with the same problems as the inventor and with no knowledge of the claimed invention, would select the elements from the cited prior art references for combination in the manner claimed. *In re Rouffet*, 47 U.S.P.Q.2d 1453, 1458 (Fed. Cir. 1998). That is, the Examiner must provide some suggestion or motivation, either in the references themselves, the knowledge of one of ordinary skill in the art, or, in some case, the nature of the problem to be solved, to modify the reference or to combine reference teachings. *See In re Dembiczak*, 175 F.3d 994, 999, 50 U.S.P.Q.2d 1614, 1617 (Fed. Cir. 1999). Whether the Examiner relies on an express or an implicit showing, the Examiner must provide particular findings related thereto. *In re Kotzab*, 55 U.S.P.Q.2d 1313, 1317 (Fed. Cir. 2000).

The Examiner admits that Simonoff does not teach <u>defining a predetermined time period</u> for presentation of a virtual event and authorizing predetermined attendees to access the virtual event <u>during the predetermined time period</u>, as recited in claim 8. Office Action (4/10/2006), page 13. The Examiner asserts that Estrada teaches this missing claim limitation. *Id.* The Examiner's motivation for modifying Simonoff with Estrada to include the above-cited claim limitations is to "give[n] multiple attendees the chance to view the event at the specified predetermined time period, and thus would have given all attendees the same opportunity to perform a function in response to the event, Estrada, col. 5, lines 51-67, col. 6, lines 1-9." Office Action (4/10/2006), page 13. The Examiner's motivation is insufficient to establish a *prima facie* case of obviousness in rejecting claims 8-9.

The Examiner's motivation ("give[n] multiple attendees the chance to view the event at the specified predetermined time period, and thus would have given all attendees the same opportunity to perform a function in response to the event") does not provide reasons, as discussed further below, that the skilled artisan, confronted

with the same problems as the inventor and with no knowledge of the claimed invention, would modify Simonoff to include the missing claim limitations of claim 8. Accordingly, the Examiner has not presented a *prima facie* case of obviousness for rejecting claims 8-9. *In re Rouffet*, 47 U.S.P.Q.2d 1453, 1458 (Fed. Cir. 1998).

As stated above, the Examiner cites column 5, lines 51-67 and column 6, lines 1-9 of Estrada as support for the Examiner's motivation. Estrada teaches a system and method for creating and managing a customizable and secure web collaboration space through the submission by a user of web forms from a web browser and allowing other users to contribute to the customization of that site as well as to its content. Column 5, lines 51-56. There is no language in these cited passages that supports the Examiner's assertion that there is motivation for providing multiple attendees the chance to view the event at the specified predetermined time period. As a result, the Examiner's cited passages do not provide reasons that the skilled artisan, confronted with the same problems as the inventor and with no knowledge of the claimed invention, would modify Simonoff to include the missing claim limitations of claim 8. Accordingly, the Examiner has not presented a *prima facie* case of obviousness for rejecting claims 8-9. *In re Rouffet*, 47 U.S.P.Q.2d 1453, 1458 (Fed. Cir. 1998).

Further, Simonoff addresses the problem of having a computer network or system where various users can use the same computer program and share information beyond the visualization of a map, text or photograph regardless of variations in the individual components of the system. Column 5, lines 13-17. The Examiner has not provided any reasons as to why one skilled in the art would modify Simonoff, which teaches a computer network or system where various users can use the same computer program and share information beyond the visualization of a map, text or photograph regardless of variations in the individual components of the system, to <u>define a predetermined time period</u> for presentation of a virtual event and authorize predetermined attendees to access the virtual event <u>during the predetermined time period</u> (missing claim limitations of Simonoff). The Examiner's motivation ("give[n] multiple attendees the chance to view the event at the specified

predetermined time period, and thus would have given all attendees the same opportunity to perform a function in response to the event") does not provide such reasoning. Hence, the Examiner's motivation does not provide reasons that the skilled artisan, confronted with the same problems as the inventor and with no knowledge of the claimed invention, would modify Simonoff to include the missing claim limitations of claim 8. Accordingly, the Examiner has not presented a *prima facie* case of obviousness for rejecting claims 8-9. *In re Rouffet*, 47 U.S.P.Q.2d 1453, 1458 (Fed. Cir. 1998).

III.    CONCLUSION:

As a result of the foregoing, it is asserted by Applicants that claims 1-17 in the Application are in condition for allowance, and Applicants respectfully request an allowance of such claims.   Applicants respectfully request that the Examiner call Applicants' attorney at the below listed number if the Examiner believes that such a discussion would be helpful in resolving any remaining issues.

Respectfully submitted,

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